

JASON M. FRIERSON
United States Attorney
District of Nevada
Nevada Bar No. 7709
PATRICK A. ROSE
Assistant United States Attorney
Nevada Bar No. 5109
501 Las Vegas Blvd. So., Suite 1100
Las Vegas, Nevada 89101
(702) 388-6336
patrick.rose@usdoj.gov

Attorneys for the Federal Defendant

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Lander County, a political subdivision of
the State of Nevada,

Plaintiff,

v.

United States Department of the Army,

Defendant.

Case No. 2:22-cv-00150-APG-EJY

**Stipulation and Order for Extension
(First Request)**

Pursuant to Federal Rule of Civil Procedure 6(b)(1) and Local Rule IA 6-1 Federal Defendant requests, and Plaintiff does not oppose, 30 day extensions of the due dates to hold a Rule 26(f) conference and submit a proposed discovery plan and scheduling order. With the United States filing its Answer on April 25, 2022, the provisions of Local Rule 26-1 result in due dates of May 25, 2022, and June 8, 2022, for the Rule 26(f) conference and the filing of a proposed discovery plan and scheduling order, respectively. This requested extension would move such due dates to June 24, 2022, and July 8, 2022, respectively. This is the first request for such an extension.

Federal Rule of Civil Procedure 6(b)(1) and Local Rule IA 6-1 allow a party to request additional time to perform an act. Defense counsel has had to devote time to a number of other matters. This work includes, but is not limited to, responding to new civil complaints, discovery in several cases, motions practice, and trial preparation for the case of *Rivera v. United States*, 2:19-cv-00306-RFB-VCF, which starts on a firm trial date of May 31, 2022. The U.S. Attorney's Office remains very busy, with two vacancies in the small defensive section of the Civil Division. Defense counsel respectfully requests this extension to allow addition time to review relevant file materials and prepare for the Rule 26(f) conference in this matter.

Respectfully submitted this 20th day of May 2022.

MARQUIS AURBACH

JASON M. FRIERSON
United States Attorney

/s/ Tabettha Martinez
CODY S. MOUNTEER, Esq.
Nevada Bar No. 1120
TABETHA MARTINEZ, Esq.
Nevada Bar No. 14237
10001 Park Run Drive
Las Vegas, NV 89145
702-382-0711
cmounteer@maclaw.com
tmartinez@maclaw.com

/s/ Patrick A. Rose
PATRICK A. ROSE
Assistant United States Attorney
Attorneys for Federal Defendant

IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE

DATED: May 20, 2022